

Bernard R. Mazaheri
Oregon Bar Number 196610
Mazaheri & Mazaheri
PO Box 656
Frankfort, Kentucky 40602
Email - Bernie@TheLaborFirm.com
Tel – (502) 475-8201
Attorney for Plaintiff Alesha Pereira

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
Portland Division**

ALESHA PEREIRA,

Plaintiff,

v.

**KAISER FOUNDATION HEALTH
PLAN OF THE NORTHWEST,**

Defendant.

Case Number [3:24-cv-122](#)

COMPLAINT

Equal Pay Act

29 U.S.C. § 216(b)

DEMAND FOR JURY TRIAL

1. The Plaintiff, Alesha Pereira, sues Defendant, Kaiser Foundation Health Plan of the Northwest doing business as Kaiser Permanente, pursuant to the Equal Pay Act (EPA) for paying men more than women.

2. The Honorable Court has original jurisdiction pursuant to 29 U.S.C. § 216(b).

3. Venue is appropriate in the Portland Division pursuant to LR 3-2(a)(1), because Defendant conducts business in Multnomah County, Oregon.

4. Plaintiff resides in Portland, Oregon.
5. Defendant employs over 500 employees.
6. Defendant has annual revenues in excess of \$1,000,000.00.
7. Plaintiff began working for Defendant in 2000.
8. Plaintiff continues to work for Defendant.
9. Defendant is Plaintiff's employer.
10. Plaintiff works in the Pharmacy department.
11. Plaintiff has the job title of Outpatient Pharmacy Quality Specialist.
12. Plaintiff is a Product/Program Manager.
13. Even though Plaintiff's primary job duty is that of a Product/Program Manager, Plaintiff is paid significantly less than her actual job duties.

14. Defendant pays Plaintiff approximately \$73,000.00 a year for her primary job duties.

15. Whereas, Defendant pays male employees that do the same job duties approximately \$150,000.00 per year.

16. Based upon information and belief, Christopher Gillet, a male, performs similar job duties as to Plaintiff, but makes more monies than Plaintiff.

17. Based upon information and belief, Joe Woller, a male, performs similar job duties as to Plaintiff, but makes more monies than Plaintiff.

18. Plaintiff, Gillet and Woller all perform the job duties of a Product/Program Manager, but the males are paid more than Plaintiff, a female.

19. The EPA proscribes discrimination "between employees on the basis of sex by paying wages to employees in such establishment at a rate less than the rate at which [the employer] pays wages to employees of the opposite sex in such establishment for equal work on jobs the performance of which requires equal skill, effort, and responsibility, and which are performed under similar working conditions." 29 U.S.C. § 206(d)(1).

20. Plaintiff was and is paid less for equal work than males that perform jobs which the performance of requires equal skill, effort, responsibility and is performed under similar conditions.

21. Defendant employs employees that handle goods or materials that have moved in interstate commerce such as computers, paper, pen, phones and vehicles.

22. Defendant is engaged in the business of healthcare.

23. Defendant is an enterprise as defined by 29 U.S.C. § 203(r).

24. Defendant is an enterprise engaged in commerce as defined by 29 U.S.C. § 203(s).

25. Defendant pays males more than females.

26. Defendant pays Plaintiff approximately \$73,000.00 per year.

27. Whereas, Defendant pays males that do similar work over \$100,000.00 per year (the average is believed to be \$150,000.00 per year).

28. Defendant intentionally paid Plaintiff less than similarly situated male employees.

29. Plaintiff notified Defendant in October 2022 that she was being paid less than males.

30. Defendant listened, but did not correct the matter.

31. Defendant willfully violated the EPA or acted in reckless disregard of the Act.

32. In fact, on May 21, 2019 Defendant told Plaintiff that she did not need to get paid more because her husband made a lot of money.

Wherefore, Plaintiff demands trial by jury, judgment, back pay, liquidated damages, attorneys' fees, costs and any other relief available under the EPA.

Respectfully submitted this 18th day of January 2024,

/s/ Bernard R. Mazaheri

Bernard R. Mazaheri
Oregon Bar Number 196610
Mazaheri & Mazaheri
PO Box 656
Frankfort, Kentucky 40602
Email - Bernie@TheLaborFirm.com
Tel – (502) 475-8201

Attorney for Plaintiff